

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
READING DIVISION**

In re: Frank Joseph Keough, Debtor Maria Concetta Keough, Joint Debtor NewRez LLC d/b/a Shellpoint Mortgage Servicing Movant v. Frank Joseph Keough, Maria Concetta Keough, Debtor/Respondent SCOTT F. WATERMAN, Esquire Trustee/Respondent	Bankruptcy No. 19-13280-pmm Chapter 13 Hearing Date: March 30, 2021 Hearing Time: 10:00am Location: The Gateway Building 201 Penn Street, 4th Floor Reading, PA 19601
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NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

NewRez LLC d/b/a Shellpoint Mortgage Servicing has filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. §362(d)(1); for costs and disbursements of this action, and for such other and further relief as to the Court may deem just and proper.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the motion, then on or before March 17, 2021, you or your attorney must filed a response to the Motion. (see Instructions on next page).**

- (a) File an answer explaining your position at: United States Bankruptcy Court, The Gateway Building, 201 Penn Street, 4th Floor, Reading, PA 19601.**

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough that it will be received on or before the dates stated above; and

(b) Mail a copy to the movant's attorney:

Charles G. Wohlrab, Esquire
Robertson, Anschutz, Schneid, Crane & Partners, PLLC
10700 Abbott's Bridge Rd., Suite 170
Duluth, GA 30097

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 19(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
3. **A hearing on the Motion** is scheduled to be held before **Patricia M. Mayer** on **March 30, 2021, at 10:00am in Courtroom 4th Floor, United States Bankruptcy Court, The Gateway Building, 201 Penn Street, 4th Floor, Reading, PA 19601.** Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing.**
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's Office in Philadelphia at 215-408-2800 or Reading at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

Dated: March 2, 2021

Robertson, Anschutz, Schneid, Crane & Partners, PLLC

Attorney for Secured Creditor
10700 Abbott's Bridge Rd., Suite 170
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Telephone: (470) 321-7112

By: /s/ Charles G. Wohlrab

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